

Philip J. Mackey, Esq.

pmackey@lewisrice.com 314.444.1343 (direct) 314.612.1343 (fax)

Attorneys at Law

600 Washington Avenue Suite 2500 St. Louis, Missouri 63101 www.lewisrice.com

October 5, 2020

## **Via Electronic Case Filing**

The Honorable Cathy Seibel United States District Court Judge Southern District of New York 300 Quarropas St. White Plains, NY 10601-4150

> Re: McClain v. AutoExpo Ent., Inc. et al., Case No. 7:20-cv-5054-CS (S.D.N.Y.)

Dear Judge Seibel:

Defendant 700 Credit, LLC ("Defendant") respectfully requests a 30-day extension, up to and including November 9, 2020, to answer, move, or otherwise respond to Plaintiff's Complaint in the above-captioned action. Defendant's responsive pleading is currently due on October 8, 2020. Defendant requests this extension because Defendant has been in discussions with Plaintiff and understands that Plaintiff does not intend to proceed on the current Complaint but instead intends to file an Amended Complaint. Plaintiff has not yet filed an Amended Complaint, and discussions are continuing. There has been one previous request for extension. This extension will not affect any other scheduled deadlines. Plaintiff consents to the extension sought herein.

Respectfully,

/s/ Philip J. Mackey
Philip J. Mackey, Esq.

cc: Counsel of Record (via ECF)